

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

O & B, INC.,

Plaintiff,

v.

UNITED STATES OF AMERICA,

Defendant.

Case No. 2:14-cv-10100

Hon. Avern Cohn

Mag. Judge R. Steven Whalen

**RESPONSE TO DEFENDANTS' FIRST SET OF REQUESTS**  
**FOR PRODUCTION OF DOCUMENTS AND THINGS**

Under the authority of Rule 34 of the Federal Rules of Civil Procedure, Defendants United States of America, and its agency, the Department of Agriculture, by and through its undersigned attorneys, hereby requests that Plaintiff O&B, Inc., produce, for the purpose of inspecting and copying, the documents and things listed below.

As used in these requests, the term "document" includes, but is not limited to, any written, recorded or graphic materials, however produced or reproduced, including, but not limited to, correspondence and other written communications, notes, memoranda, and articles.

1. Federal, state, and city Income Tax Returns for O&B, Inc., from the 2006 to the present.

**RESPONSE:**

Records attached.

2. Federal, state, and city Income Tax Returns for O & K B, LLC, from the 2006 to the present.

RESPONSE:

Will be provided.

3. Federal, state, and city Income Tax Returns for Kamal Berro, from the 2006 to the present.

RESPONSE:

Will be provided.

4. Summary of Sales/Use/Withholding Tax for O&B, Inc., from 2006 to the present.

RESPONSE:

Will execute authorization to provide.

5. Articles of incorporation, bylaws, minute book, stock book, stock transfer records, profit and loss statements and annual reports for O&B, Inc., from its incorporation to the present.

RESPONSE:

Will provide.

6. Articles of incorporation, bylaws, minute book, stock book, stock transfer records, profit and loss statements and annual reports for O & K B, LLC, from its incorporation to the present.

RESPONSE:

Will provide.

7. Copy of any and all documents pertaining to any changes in corporate leadership and ownership of O&B, Inc., from 2004 to the present.

RESPONSE:

See attached.

8. Copy of any and all documents pertaining to any changes in corporate leadership and ownership of O & K B, LLC, from 2004 to the present.

RESPONSE:

See Attached.

9. Copy of any and all documents regarding, including proof of consideration, the sale, transfer, or conveyance by any other means of shares of O&B, Inc., and/or its assets from 2004 to the present, including on or about September 29, 2004.

RESPONSE:

See Attached.

10. Copy of any and all documents regarding any leases to which O&B, Inc., is a party, including any lease of 4710 W. Warren Avenue in Detroit, Michigan.

RESPONSE:

Will provide.

11. Copy of any and all documents regarding any leases to which O & K B, LLC, is a party, including any lease of 4710 W. Warren Avenue in Detroit, Michigan.

RESPONSE:

Will provide.

12. Copy of any and all documents showing payment on lease obligations, or any other obligations, to O & K B, LLC, by O&B, Inc., or by any other person or entity on its behalf.

RESPONSE:

13. Valuations of O&B, Inc. and/or its assets used to arrive at the price(s) used in the

sale or transfer of its shares on or about September 29, 2004.

RESPONSE:

See Attached.

14. Correspondence and any record of any communications pertaining to the sale, transfer, or conveyance by any other means of shares of O&B, Inc., and/or its assets, and its change of leadership, on or about September 29, 2004.

RESPONSE:

15. Copy of any mortgage on the property at 4710 W. Warren Avenue in Detroit, Michigan.

RESPONSE:

Will provide.

16. Copy of contracts with any and all vendors and suppliers listed in response to Interrogatory #8 in Defendant's First Set of Interrogatories.

RESPONSE:

17. Copy of any insurance policies with any insurers listed in response to Interrogatory #9 in Defendant's First Set of Interrogatories.

RESPONSE:

18. Copy of utility bills for each utility provider listed in response to Interrogatory #10 in Defendant's First Set of Interrogatories.

RESPONSE:

Utility bills attached.

19. Copy of any receipts or other proof of payment on the obligations listed in response to Interrogatory #15 in Defendant's First Set of Interrogatories.

RESPONSE:

Bank records will be provided.

20. Copy of document pertaining to any default listed in response to Interrogatory #16 in Defendant's First Set of Interrogatories.

RESPONSE:

Will provide.

21. Any and all documents used or consulted to respond to Defendant's First Set of Interrogatories.

RESPONSE:

See attached documents.

22. All documents, data compilations, and tangible things that are in the possession, custody, or control of Plaintiff, that it may use to support its claims.

RESPONSE:

See attached documents. Will be supplemented as records come in.

23. Please sign, date, and return the attached (1) Tax Information Authorizations enabling defense counsel to obtain tax records from the Internal Revenue Service; and (2) releases from O&B, Inc., and/or any other account holder, as appropriate to the account, for each and every account identified in Interrogatory #12.

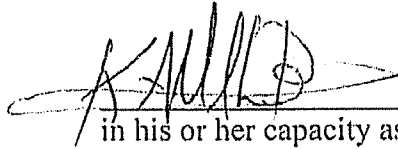
RESPONSE:

See attached.

**DECLARATION**

I, Kamal Berro, in my capacity as Owner, on behalf of O&B, Inc., plaintiff, declare under penalty of perjury that the foregoing responses to Defendant's First Set of Requests for Production of Documents, are true and correct.

Executed on 06/11/2014.

  
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in his or her capacity as

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